

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI**

ANGELA HAYNES	)	
Plaintiff	)	
	)	
VS.	)	Case No. 6:20-cv-3408
	)	
EDP ENTERPRISES, INC.	)	
Defendant	)	JURY TRIAL DEMANDED

**COMPLAINT**

PLAINTIFF, by counsel, sets forth her Complaint against Defendant as follows:

1. This cause of action is brought pursuant to Title VII of the Civil Rights Act of 1964.
2. The events giving rise to this cause of action occurred within the jurisdiction of the Western District of Missouri.
3. Plaintiff was an employee of Defendant in Pulaski County, Missouri between 2015 and 2020.
4. Plaintiff's race is Caucasian.
5. Plaintiff's national origin is Brazilian.
6. In or about May 2019 Plaintiff reported to her superior Kevin Brooks that she believed she was being the target of harassment based on her race and national origin.
7. In response to Plaintiff's complaints, Defendant, via its agents engaged in a course of retaliation against Plaintiff, including:
  - a. Unwarranted write-ups and disciplinary actions,
  - b. Suspension from her employment,
  - c. Transfer to less-desirable assignments.
8. As a result of the harassment and retaliation, Plaintiff has suffered lost wages and severe mental and emotional distress.
9. Defendant's actions were willful and made with malice or reckless indifference.
10. Plaintiff filed a Charge of Discrimination with the EEOC in January 2020. A

true and accurate copy is attached hereto as Exhibit 1 and incorporated herein by reference.

11. On September 25, 2020 the EEOC issued Plaintiff a Notice of Right to Sue. A true and accurate copy is attached hereto as Exhibit 2 and incorporated herein by reference.

WHEREFORE Plaintiff prays the Court for judgment against Defendant for Plaintiff's damages, including lost wages, emotional distress, punitive damages, attorney fees, costs, and such other relief as is just and proper.

LAMPERT LAW OFFICE, LLC

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